



# Pacific County COMMISSIONERS

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DEC 10 2014

WA State Department  
of Ecology (SWRO)

December 7, 2014

Derek Rockett  
Washington State Department of Ecology  
Water Quality Program  
Southwest Regional Office  
P O Box 47775  
Olympia, WA 98504

Dear Mr. Rockett,

Thank you for the opportunity to provide comment on the proposed individual permit to regulate the use of imidacloprid for the management of burrowing shrimp, submitted by the Willapa Bay and Grays Harbor Oyster Growers Association.

Pacific County's economic viability is greatly dependent upon our natural resource industries. Shellfish production has contributed to Pacific County's natural resource economy for over 100 years. This industry provides hundreds of jobs and an immeasurable indirect impact to our communities.

Burrowing shrimp have been a recognized threat to shellfish beds since the 1940's. Since 1963, this threat has been addressed by application of carbaryl. Despite the use of carbaryl, Willapa Bay has remained pristine and productive as substantiated in your October 24, 2014, Fact Sheet, "Willapa Bay is generally considered one of the most biologically productive estuaries on the Pacific Coast... Unpolluted water and good circulation account for this productivity and resulting commercial and recreational benefits." Without treatment, many of our shellfish beds will be rendered unusable. This new management tool, imidacloprid, appears to provide necessary relief from burrowing shrimp with fewer negative impacts.

We support the approval of the proposed permit for use of imidacloprid as part of an integrated pest management program for burrowing shrimp.

PACIFIC COUNTY  
BOARD OF COUNTY COMMISSIONERS

  
Steve Rogers, Chairman

  
Frank Wolfe, Commissioner

  
Lisa Ayers, Commissioner